

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

THE UNITED STATES for the use of )  
GMW Fire Protection, Inc., an Alaska )  
Corporation, )

Plaintiff, )

vs. )

KANAG'IQ CONSTRUCTION CO., )  
INC., an Alaska Corporation, and )  
WESTERN SURETY COMPANY, a )  
South Dakota Corporation, )

Defendants. ) Case No. A05-170 CI (TMB)

**DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS**

Defendants, KANAG'IQ CONSTRUCTION CO., INC. and WESTERN SURETY COMPANY ("Kanag'iq"), through their counsel, Eide & Gingras, P.C., propose the following areas of questions for voir dire, based on the assumption that the Court has its own standard questions with respect to citizenship, ability to speak the English language, knowledge of witnesses, lawyers, membership in organizations, and the like. Assuming that the Court has such standard questions, Kanag'iq intends to inquire on the following subjects:

1. Military service, past or present.
2. The jurors' views on tort reform.
3. Hobbies, movies, bumper stickers, books read recently, special interests,

and the like.

1 4. Experience with contracts in any form, including, but not limited to,  
2 construction contracts, remodeling contracts, contracts for the sale or purchase of  
3 automobiles, and the like.

4 5. Experience with any claim or dispute involving contracts.

5 6. Experience with bonding companies versus insurance companies and an  
6 appreciation of the difference.

7 7. If justified by the evidence, the prospective jurors' feelings about awarding  
8 significant damages.

10 8. Employment experience in either the insurance or bonding industry.

11 9. Experience in bookkeeping/accounting.

12 10. Experience in business management.

13 11. Experience in the construction industry.

14 DATED at Anchorage, Alaska this 2<sup>nd</sup> day of January 2008.

16 EIDE & GINGRAS, P.C.  
17 Attorneys for Defendants  
18 Kanag'iq Construction Co., Inc.  
And Western Surety Company

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**CERTIFICATE OF SERVICE**

I am a legal secretary employed by the law  
firm of Eide & Gingras, P.C. That on this  
2<sup>nd</sup> day of January 2008, I served

☒ Electronically

a true and accurate copy of the foregoing  
document upon the following counsel of record:

Sarah J. Tugman, Esq.  
2509 Eide Street, Suite 4  
Anchorage, AK 99503

EIDE & GINGRAS, P.C.

By /s/Donna Charter

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Defendants' Proposed Voir Dire Questions

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